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May 17, 2017

Ms. Amy Green
Secretary of the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: Docket No. 17-GIMT-426-GIT

Dear Ms. Amy Green:

United Telephone Company of Kansas d/b/a CenturyLink has enclosed for filing revisions to its Access Service Tariff with a proposed effective date of July 1, 2017. The following tariff revisions are included in this filing:

Section 2	First Revised Page 48	Section 2 (Cont'd)	Original Page 50.6
	First Revised Page 49		Original Page 50.7
	First Revised Page 50		Original Page 50.8
	Original Page 50.1		Original Page 50.9
	Original Page 50.2	Section 6	First Revised Page 19
	Original Page 50.3		Fourth Revised Page 148
	Original Page 50.4		Third Revised Page 149
	Original Page 50.5		Sixth Revised Page 150

This filing proposes the sixth step in implementing the Terminating Switched End Office Access Service reductions pursuant to the FCC's November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Docket Nos. 10-90, etc. (FCC 11-161). The Terminating Switched End Office Intrastate Access Service reductions proposed herein are as required by 47 C.F.R. §51.907(b). It is also filed consistent with the *Order Opening Docket; Requiring All Carriers To File Revised Intrastate Access Tariffs And Documentation For Phase 6 Of ICC Reform* issued on March 28, 2017 under Docket No. 17-GIMT-426-GIT by the State Corporation Commission of the State of Kansas.

Enclosed as Attachment A, please find supporting documentation for the proposed rate reductions. All information included in Attachment A, other than existing and proposed rates, is being filed as CONFIDENTIAL as it contains market/product-specific information relating to the services offered by the Company. As described in the narrative description in Attachment B, CenturyLink's supporting documentation demonstrates this filing is the sixth step in implementing the Terminating Switched End Office Intrastate Access Service reductions mandated by the FCC. This information includes company-specific calculations that are presented using the "Access Reduction Spreadsheet" template released by the Federal Communications Commission ("FCC") on April 24, 2017. The FCC has mandated that carriers like CenturyLink utilize this template for calculation of the July 2017 access reductions, and use of this template will keep the mandated access reduction calculations consistent with the FCC's requirements.

Also enclosed is the CenturyLink certification certifying that CenturyLink is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism established by the Transformation Order. The Baseline and Eligible Recovery worksheet and certification will be filed on June 30, 2017.

If you have any questions regarding this filing, please feel free to call me at 913-353-7070.

Sincerely,



Christina L. Chushuk
Manager, Regulatory Operations

Attachments

cc: John Idoux

KS17-03A

CHRISTINA L. CHUSHUK
Manager, Regulatory Operations
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ATTACHMENT A

Attachment A includes:

1. **FCC ICC/USF Compliance Filing Rates Decreases (Terminating Switched End Office Intrastate Access Service) and Narrative Description of Methodology.**

**The Information that follows this page is considered
CONFIDENTIAL**

CONFIDENTIAL

CenturyLink submits the enclosed trade secret, confidential and/or financial information.

Trade secret, confidential and/or financial information designation is pursuant to K.A.R. 66-1220a. This confidential information, if disclosed, would likely result in harm to CenturyLink or another party's economic or competitive interest, or would result in harm to the public interest generally, and is not otherwise available from public sources for the following reasons:

- ☐ Contains information relating directly to specific customers
- ☐ Contains employee-sensitive information
- ☒ Contain marketing analysis or other market-specific information relating to services offered in competition with others
- ☐ Contains reports, work papers or other documentation related to work produced by internal auditors or consultants
- ☐ Contains strategies employed, to be employed or under consideration
- ☐ Contains contract negotiations
- ☐ Contains information concerning trade secrets as well as private technical, financial and business information
- ☒ Contains information which has been designated as trade secret or confidential commercial information by another party

**United Telephone Companies of Kansas d/b/a CenturyLink
CenturyLink-Kansas 2017
FCC ICC/USF Compliance Filing Rates Decreases**

CONFIDENTIAL

**United Telephone Companies of Kansas d/b/a CenturyLink
CenturyLink-Kansas 2017
FCC ICC/USF Compliance Filing Rates Decreases**

NARRATIVE DESCRIPTION OF ACCESS RATE REDUCTION

The following narrative describes the methodology and supporting calculations utilized by CenturyLink to implement the process of reducing terminating switched end office rates to bill-and-keep (not to exceed \$0.0000/MOU) and terminating traffic traversing a tandem switch. When a CenturyLink Price Cap ILEC owns the tandem and a CenturyLink Price Cap ILEC owns the terminating End Office Switch, the tandem switched rates will be considered "Tandem-to-End Office" and will transition to \$0.0007/MOU as required by 47 C.F.R. §51.907(g)¹, which addresses changes beginning July 1, 2017. All other tandem traffic that traverses a CenturyLink Price Cap ILEC-owned tandem and does not terminate to an end user served by a CenturyLink Price Cap ILEC end office will be considered "Tandem-to- 3rd Party" and will continue to be billed at the current Interstate rates, including tandem traffic traversing a CenturyLink Price-Cap ILEC-owned tandem to an affiliated CenturyLink CLEC end office. Tandem-Switched Transport charges associated with traffic traversing a non-CenturyLink Price Cap ILEC-owned tandem, but terminating to a CenturyLink-owned end office will also remain at current Interstate rates. CenturyLink's supporting calculations utilize the "Access Reduction Spreadsheet" template released by the Federal Communications Commission ("FCC") on April 24, 2017 for calculating the July 1, 2017 Interstate and Intrastate access rate changes.

The FCC spreadsheet template also provides the methodology for calculating the rate changes and identifies, in detail, the Interstate access rates that are required to be changed consistent with the FCC rules. Step 6 of the USF ICC Transformation Order adjusts Interstate Terminating End Office Access rates down to the target composite rate of \$0.0000/MOU and Tandem-Switched Transport to the target composite rates as discussed above. The Interstate rates will be mirrored on the Intrastate side so that rates will remain in parity.

Section 51.907(g) of the FCC rules required the Access Reduction Spreadsheet to be modified to reflect rate reductions for July 1, 2017. For Price Cap carriers that file Interstate tariffs assessing a single rate applicable in different states, the Interstate demand utilized shall be the sum of the demand for all of the states included in the tariff, rather than making separate state-by-state calculations. For companies with a single rate in multiple states, the calculations are done at the regional level and the regional rates are mirrored in each study area². For individual study areas, the calculations are done at the study area level. An overview of the steps and methodology used to reduce terminating End Office and Tandem-Switched Transport access rates are as follows:

1. Lower the terminating End Office Switched Access Rates to bring the 2017 composite rate to zero.
2. Establish the 2011 Baseline Composite Terminating Tandem-Switched Transport Access Rate by splitting the Tandem- Switched Transport demand between various traffic scenarios. Tandem-to-End Office traffic is the affiliate-terminated traffic that the Order requires for further transitions/reductions. This traffic was identified by using a relationship of 2016 traffic and applied to the demand already loaded in the model. Dedicated Tandem Trunk Ports are not part of the transition per Rule 51.903(i) that expressly excludes rate elements in Part 69.111.
3. Calculate the 2017 Target Composite Terminating Tandem-Switched Transport Access Rate for Tandem-to-End Office by reducing the 2011 Baseline Composite Terminating Tandem-Switched Rate to not exceed \$0.0007/MOU.
4. Calculate the individual Interstate Terminating Tandem-Switched Access Tandem-to-End Office rate levels such that the reduced rates and demand will equal the 2017 Target Composite Terminating Tandem-Switched Access Rate.
5. Set Intrastate Terminating End Office and Tandem-Switched Transport Access rates equal to their functionally equivalent Interstate rates.
6. Prepare Intrastate and Interstate tariff documents as required by each tariff jurisdiction.

¹ Per guidance from FCC Staff.

² See footnote No. 27 in clarification order: Connect America Fund, et al., DA 14-434, WC Docket No. 10-90 et al.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(7) (Cont'd)

For orders involving Hubs the order must be placed in the state where the Hub is located. An interconnection point will be determined by the Exchange Telephone Company and will be used to determine the billing for each state. All appropriate charges in each state rate schedule are applicable. The rate for the Channel Mileage element will be determined as set forth in (8) following.

(8) When Terminating Tandem Switched Transport is provided through a CenturyLink Operating Company (CLOC) ILEC Access Tandem and the Terminating End Office is not owned by any CLOC ILEC or through an ILEC Access Tandem not owned by a CLOC ILEC and the Terminating End Office is owned by a CLOC ILEC, Terminating – Tandem 3rd Party rates are applicable; otherwise, Terminating – Tandem End Office rates are applicable. When originating Tandem Switched Transport is provided, Originating rates are applicable. The rate for the Transport or Channel Mileage element for services provided as set forth in (1) through (7) preceding is determined in as follows:

(a) Determine the appropriate Transport or Channel Mileage by computing the airline mileage between the two ends of the Transport or Channel Mileage element. Determine the airline mileage for the Transport element using the V & H method as set forth in 6.7.11 following. Determine the airline mileage for the Channel Mileage element using the V & H method as set forth in 7.4.5 following.

(b) Determine the rate for the airline mileage determined in (a) preceding using the Telephone Company's tariff. Multiply such rate by the Telephone Company's billing percentage factor and divide by 100 to obtain the Transport element or Channel Mileage element charges.

(9) The interconnection points will be determined by the Exchange Telephone Companies involved. The billing percentage factor for the Telephone Company for the service between the two involved offices is listed in National Exchange Carrier Association, Inc. Tariff F.C.C. No. 4.

(N)

(N)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

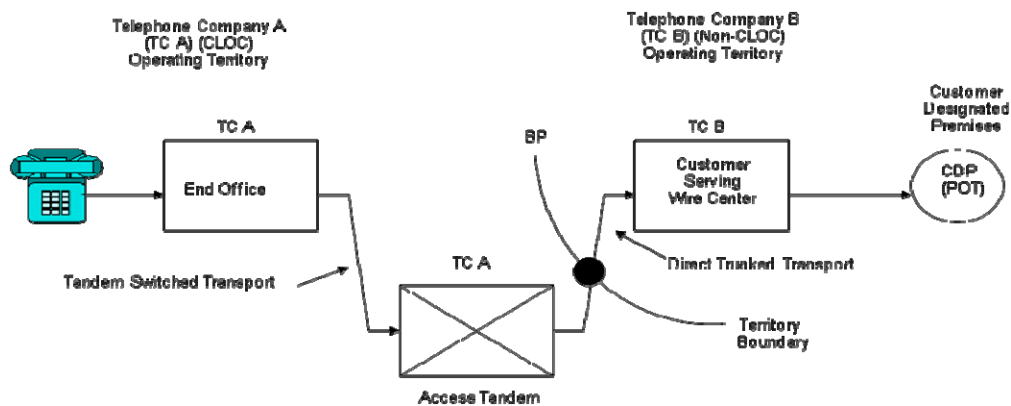
2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(10) Example 1: Originating Switched Access
(See Diagram 1)

- Feature Group D Switched Access is ordered to End Office.
- Originating End Office and Access Tandem are in the operating territory of a Telephone Company (TC-A).
- Customer Designated Premises is in the operating territory of a Telephone Company (TC-B).
- Assumptions:
 - o TC-A Direct Trunked Transport BP = 40%
 - o TC-B Direct Trunked Transport BP = 60%
 - o Direct Trunked Transport mileage = 26 mi.
 - o Tandem Switched Transport mileage = 23 mi.

Diagram 1



ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(10) Example 1: Originating Switched Access (Cont'd)
(See Diagram 1)

Telephone Company A charges are:

End Office charges = 9,000 min. x EO rate

Tandem Switched Facility charge
= 9,000 min. x 23 mi. x TSF rate

Tandem Switched Termination charge
= 2 terminations x 9,000 min. x TST rate

Tandem Switching charge
= 9,000 min x TS rate

Direct Trunked Facility charge
= 26 miles x DTF rate x 40%

Direct Trunked Termination charge
= 1 termination x DTT rate

Common Transport Multiplexing charge
= 9,000 min x CTM rate

(C)

(C)

ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(11) Example 2: Terminating Switched Access – Tandem 3rd Party
(See Diagram 2A and 2B)

- Feature Group D Switched Access is ordered to End Office.
- Terminating Access Tandem is owned by CLOC ILEC carrier (TC-A) and End Office is owned by a non-CLOC ILEC carrier (TC-B)
- Assumptions:
 - o TC-A Direct Trunked Transport BP = 40% (where applicable Diagram 2A)
 - o TC-B Direct Trunked Transport BP = 60% (where applicable Diagram 2A)
 - o Direct Trunked Transport mileage = 26 mi.
 - o TC-A Tandem Switched Transport BP = 20%
 - o TC-B Tandem Switched Transport BP = 80%
 - o Tandem Switched Transport mileage = 23 mi.

(N)

ISSUE DATE:
May 17, 2017

Gary L. Kepley
Director, Regulatory Operations

EFFECTIVE DATE:
July 1, 2017

ACCESS SERVICE

2. General Regulations (Cont'd)

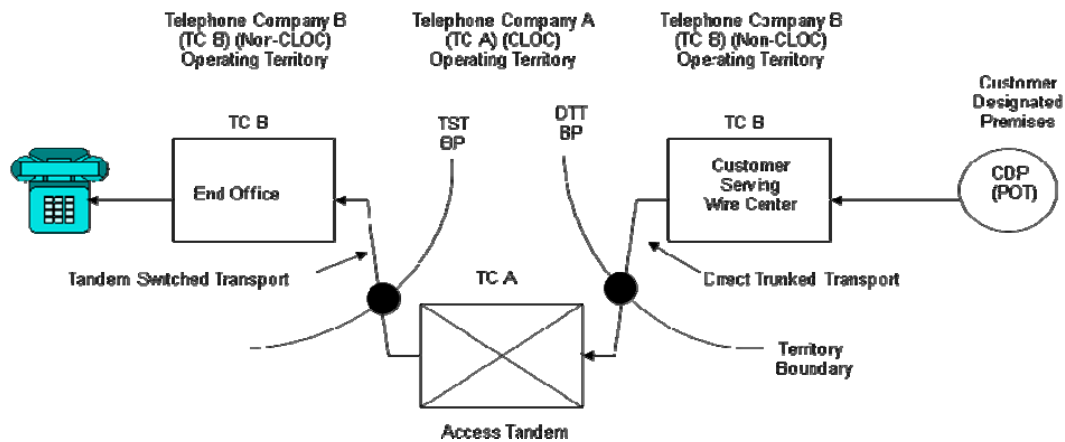
2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

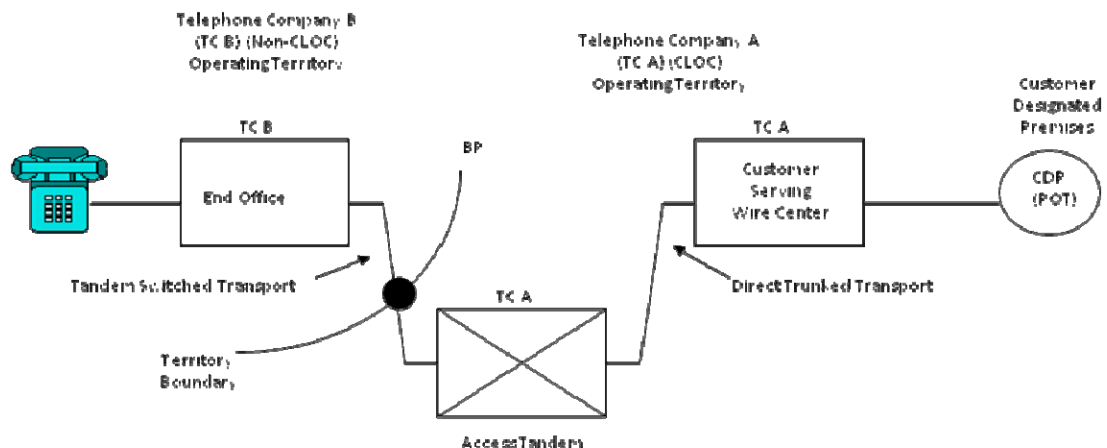
(B) (Cont'd)

(11) Example 2: Terminating Switched Access – Tandem 3rd Party (Cont'd)
(See Diagram 2A and 2B)

- Diagram 2A



- Diagram 2B



BP = Billing Percentage

ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(11) Example 2: Terminating Switched Access – Tandem 3rd Party
(Cont'd)
(See Diagram 2A and 2B)

Example 2 Telephone Company A charges are:

Tandem Switched Facility – 3rd Party charge
= 9,000 min. x 23 mi. x TSF-3rd Party rate x 20%

Tandem Switched Termination – 3rd Party charge
= 1 termination x 9,000 min. x TST-3rd Party rate

Tandem Switching – 3rd Party charge
= 9,000 min. x TS-3rd Party rate

Direct Trunked Facility charge
2A = 26 miles x DTF rate x 40%
2B = 26 miles x DTF rate

Direct Trunked Termination charge
2A = 1 termination x DTT rate
2B = 2 termination x DTT rate

Common Transport Multiplexing – 3rd Party charge
= 9,000 min x CTM-3rd Party rate

(N)

ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

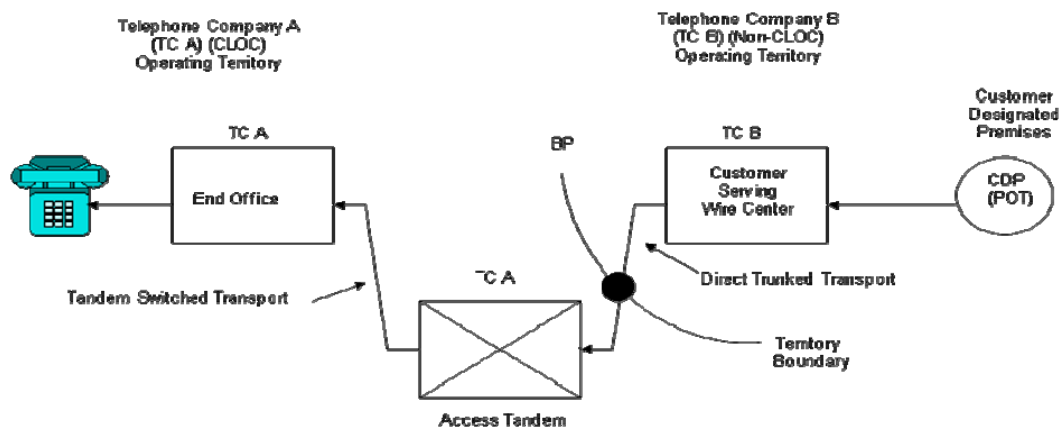
2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(12) Example 3: Terminating Switched Access – Tandem End Office (See Diagram 3)

- Feature Group D Switched Access is ordered to End Office.
- Terminating End Office and Access Tandem are both owned by a CLOC ILEC (TC-A)
- Assumptions:
 - o TC-A Direct Trunked Transport BP = 40%
 - o TC-B Direct Trunked Transport BP = 60%
 - o Direct Trunked Transport mileage = 26 mi.
 - o Tandem Switched Transport mileage = 23 mi.

Diagram 3



(N)

ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(12) Example 3: Terminating Switched Access – Tandem End Office
(Cont'd)
(See Diagram 3)

- Telephone Company A charges are:

End Office Charges = 9,000 min. x EO rate

Tandem Switched Facility – End Office charge
= 9,000 min. x 23 mi. x TSF-End Office rate

Tandem Switched Termination – End Office charge
= 2 terminations x 9,000 min. x TST-End Office rate

Tandem Switching – End Office charge
= 9,000 min. x TS-End Office rate

Direct Trunked Facility Charge
= 26 miles x DTF rate x 40%

Direct Trunked Termination charge
= 1 termination x DTT rate

Common Transport Multiplexing – End Office charge
= 9,000 min x CTM-End Office rate

(N)

ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

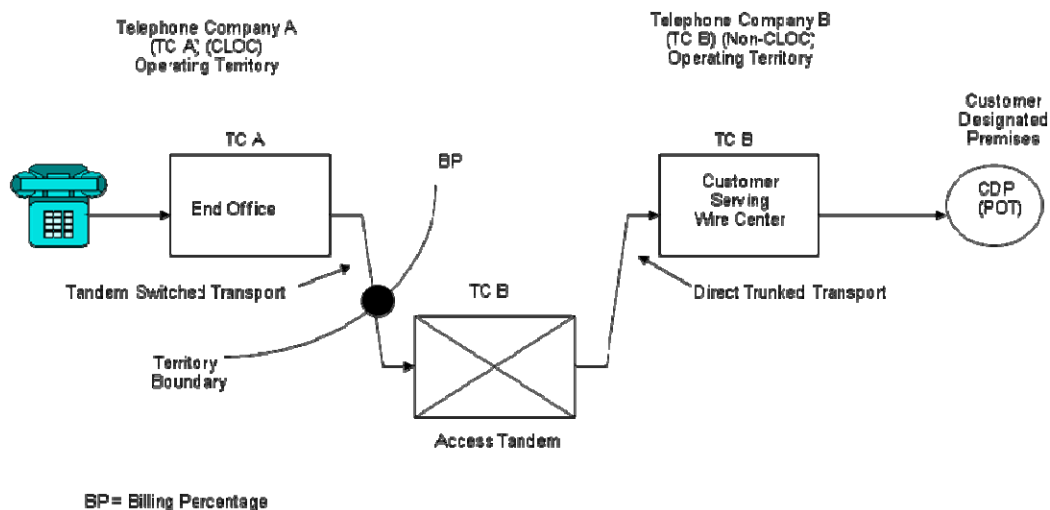
2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(13) Example 4: Originating Switched Access – CLOC owns only the End Office (See Diagram 4)

- Feature Group D Switched Access is ordered to End Office
- End Office is owned by CLOC (TC-A)
- Access Tandem is owned by a non-CLOC ILEC (TC-B)
- Assumptions:
 - o Direct Trunked Transport mileage = 26 mi.
 - o TC-A Tandem Switched Transport BP = 80%
 - o TC-B Tandem Switched Transport BP = 20%
 - o Tandem Switched Transport mileage = 23 mi.

Diagram 4



(N)

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2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(13) Example 4: Originating Switched Access – CLOC owns only
the End Office (Cont'd)
(See Diagram 4)

- Telephone Company A charges are:

End Office charges = 9,000 min. x EO rate

Tandem Switched Facility charge
= 9,000 min. x 23 mi. x TSF rate x 80%

Tandem Switched Termination charge
= 1 termination x 9,000 min. x TST rate

(N)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

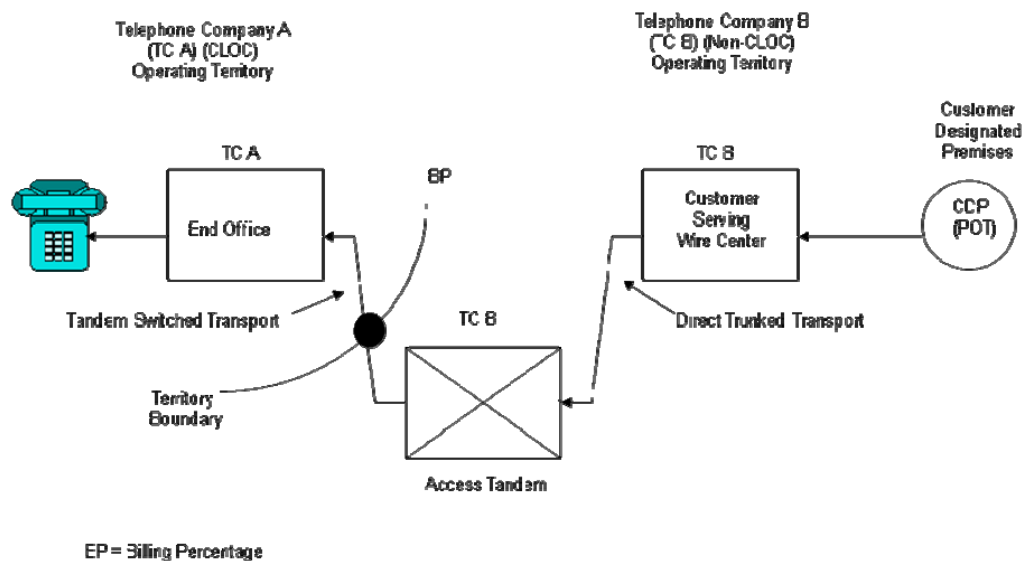
2.4.8 Ordering, Rating and Billing of Access Services Where More Than One Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(14) Example 5: Terminating Switched Access – Tandem 3rd Party (See Diagram 5)

- Feature Group D Switched Access is ordered to End Office
- End Office is owned by Telephone Company (CLOC) (TC-A)
- Access Tandem is owned by a non-CLOC ILEC (TC-B)

Diagram 5



ACCESS SERVICE

2. General Regulations (Cont'd)

(N)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.8 Ordering, Rating and Billing of Access Services Where More Than One
Exchange Telephone Company or Rate Schedule is Involved (Cont'd)

(B) (Cont'd)

(14) Example 5: Terminating Switched Access – Tandem 3rd Party
(Cont'd)
(See Diagram 5)

- Telephone Company A charges are:

End Office charges = 9,000 min. x EO rate

Tandem Switched Facility 3rd Party charge
= 9,000 min. x 23 mi. x TSF-3rd Party rate x 80%

Tandem Switched Termination 3rd Party charge
= 1 termination x 9,000 min. x TST-3rd Party rate

(N)

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6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(B) Switched Transport (Cont'd)

(2) Direct-Trunked Transport (Cont'd)

Direct-Trunked Transport also provides for the transmission facilities between the Telephone Company's serving wire center and a hub that interconnects facilities for both Tandem-Switched Transmission and Direct-Trunked Transport.

(3) Tandem-Switched Transport

Tandem-Switched Transport provides the communication path between the serving wire center of a customer's premises and an end office, and includes tandem switching functions. Tandem-Switched Transport also includes circuits dedicated to the use of a single customer (from the serving wire center to the access tandem) and circuits provided for the common use of all customers who have requested tandem switching (from the access tandem to the end office). Tandem-Switched Transport is available for use with all trunk side Switched Access services. Tandem-Switched Transport is not available for use with line side Switched Access services. For examples of Tandem Switched Transport see Section 2.4.8 preceding. (N)
(N)

Tandem-Switched Transport provides for the transmission facilities between the Telephone Company's serving wire center and an end office that is switched through a tandem. Tandem-Switched Transport is composed of two subelements:

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.8 Rates and Charges (Cont'd)

6.8.2 Switched Transport (Cont'd)

(C) Tandem-Switched Transport

		<u>Rate Per Access Minute</u>			
		<u>Originating</u>	<u>Terminating 3rd Party</u>	<u>Terminating End Office</u>	(T) (T)
(1) Tandem-Switched Transmission					
(a) Facility (Per Mile)					
	Zone 3	\$0.000025	\$0.000023	\$0.000000 (R)	
	Zone 4	\$0.000025	\$0.000025	\$0.000000 (R)	
(a) Termination (Fixed)					
	Zone 3	\$0.000278	\$0.000245	\$0.000085 (R)	
	Zone 4	\$0.000278	\$0.000278	\$0.000087 (R)	
(2) Tandem Switching					
	Zone 3	\$0.000425	\$0.000381	\$0.000381	
	Zone 4	\$0.000425	\$0.000425	\$0.000425	
(3) Common Transport Multiplexing					
	Zone 3	\$0.000277	\$0.000254	\$0.000000 (R)	
	Zone 4	\$0.000277	\$0.000277	\$0.000000 (R)	
(4) Dedicated Trunk Port				<u>Monthly Rates</u>	
(a)	Per DS0			\$3.66	
(b)	Per DS1			\$93.40	

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6. Switched Access Service (Cont'd)

6.8 Rates and Charges (Cont'd)

6.8.2 Switched Transport (Cont'd)

(D) Optional Features (Cont'd)

(3) Customer Specification
of Feature Group
Directionality
(Available with
FGB, FGC*, FGD)

- One-Way Operation in lieu
of Two-Way Operation

Monthly
Rates

Nonrecurring
Charges

GAR

GAR

- Two-Way Operation in lieu
of One-Way Operation

GAR

GAR

(4) Customer Specification of
Switched Transport Termination
(Available with FGB with Type B
Transmission Performance)

- Four-Wire Termination in
lieu of Two-Wire Termination

GAR

GAR

(E) Network Blocking Charge

Rate Per Call Blocked

- Per Call**

GAR

(F) Installation [Note 1]

Nonrecurring Charges

(T)

- Per Line

\$20.00

(R)

- Per Trunk

\$20.00

(R)

* For FGC this option is available only in appropriately equipped end offices.

** Applies to FGD.

[Note 1] This flat rated charge was calculated based upon a 50/50 split between originating and terminating. The FCC in their FCC 11-161 ICC Transformation Order in Section 51.907(d)(1) allowed Price Cap Carriers to use an equal split to divide the charge between originating and terminating elements. When the terminating portion of the rate is reduced and then combined with the originating portion of the rate, a single flat rate is generated for billing purposes.

(N)

(N)

ISSUE DATE:
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Gary L. Kepley
Director, Regulatory Operations

EFFECTIVE DATE:
July 1, 2017

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6. Switched Access Service (Cont'd)

6.8 Rates and Charges (Cont'd)

6.8.3 Local Switching

(A) <u>LS1 and LS 2</u>		<u>Rate</u> <u>Per Access Minute</u>	
Feature Groups A, B, C and D			
Originating		\$0.003983	
Terminating		\$0.000000	(R)
(B) <u>Dedicated Trunk Port</u>		<u>Monthly Rates*</u>	
(1) Per DS0		\$1.83	
(2) Per DS1		\$46.70	
(C) <u>Common Trunk Port</u>		<u>Per Access Minute</u>	
Originating		\$0.000498	
Terminating		\$0.000000	

* The End Office Dedicated Trunk Port rate was calculated based upon a 50/50 split between originating and terminating traffic using this flat-rated port. The FCC in their FCC 11-161 ICC Transformation order in section 51.907(d)(1) allowed Price Cap Carriers to use an equal split to divide the charge between originating and terminating elements. When the terminating portion of the rate is reduced and then combined with the originating portion of the rate, a single flat rate is generated for billing purposes. The DS0 Originating portion of the charge is \$1.83 and the DS1 Originating portion of the charge is \$46.70.

ISSUE DATE:
May 17, 2017

Gary L. Kepley
Director, Regulatory Operations

EFFECTIVE DATE:
July 1, 2017

CERTIFICATION

I am Vice President – Regulatory Operations for CenturyLink. I hereby certify that I have overall responsibility for supervision of the personnel who prepare all of the data supporting the CenturyLink Operating Companies– July 1, 2017 Annual Access Charge Tariff Filing bearing Tariff F.C.C. Nos. 1, 2, 3, 6, 7, 8, 9 and 11 for all issuing carriers and that I am authorized to execute this certification. Based upon the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the Tariff Review Plan information contained herewith, I hereby certify that the data has been examined and reviewed and is true, correct and complete to the best of my knowledge and belief.

Further, based upon the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the Eligible Recovery for Price Cap Carriers and Access Recovery Charge information contained herewith, I hereby certify that the data has been examined and reviewed and is true, correct and complete to the best of my knowledge and belief, that the CenturyLink Operating Companies are not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism, and that CenturyLink Operating Companies have complied with sections 51.915(d), 51.915(e) and 51.915(f) of the Commission's rules.

May 17, 2017



Jeff Glover
Vice President – Regulatory Operations

Contact Person: Gary Kepley
Director, Regulatory Operations
Telephone Number: (913) 353-7080